

From: [Mark Fisher](#)
To: [Nancy Hamill](#)
Cc: [Schick, Kevin](#); [Haklar, James](#); [Schindler, Jason](#)
Subject: RE: Hatco Site, Fords NJ, PI# G000003943
Date: Friday, January 18, 2019 10:14:27 AM

Hi Nancy – hope all is well. Things are progressing with the ERA. We (Weston, myself) have been working with Windward (eco specialty firm that you met at one of our prior meetings) and have our ERA workplan completed. We are currently coordinating access to implement the field work, with goal of being out in the field in the spring. Let me know if you have any questions or would like to talk further. Have a good weekend. Mark

From: Hamill, Nancy <Nancy.Hamill@dep.nj.gov>
Sent: Thursday, January 17, 2019 9:46 AM
To: Mark Fisher <MFisher@elminc.com>
Cc: Schick, Kevin <Kevin.Schick@dep.nj.gov>; Haklar, James <Haklar.James@epa.gov>
Subject: RE: Hatco Site, Fords NJ, PI# G000003943

Mark, can you please provide an update regarding status of the RIR, including Ecological Risk Assessment.

Thank you.

Nancy E. Hamill

Research Scientist

Bureau of Environmental Evaluation and Risk Assessment

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From: Mark Fisher <mfisher@elminc.com>
Sent: Thursday, June 28, 2018 9:22 AM
To: Hamill, Nancy <Nancy.Hamill@dep.nj.gov>
Cc: Schick, Kevin <Kevin.Schick@dep.nj.gov>; Haklar, James <Haklar.James@epa.gov>
Subject: RE: Hatco Site, Fords NJ, PI# G000003943: Supplemental Sediment Sampling Report, Crows Mill Creek

Hi Nancy – in response to your question, yes we have been in communication with the EPEC PRCR and LSRP (in the past and more recently) regarding the data/conditions at AOC4. I suspect that the ultimate resolution of this issue will take a while to resolve but it is certainly something that we plan to push. Thanks, Mark

From: Hamill, Nancy <Nancy.Hamill@dep.nj.gov>
Sent: Thursday, June 21, 2018 10:27 AM
To: Mark Fisher <mfisher@elminc.com>
Cc: Schick, Kevin <Kevin.Schick@dep.nj.gov>; Haklar, James <Haklar.James@epa.gov>
Subject: RE: Hatco Site, Fords NJ, PI# G000003943: Supplemental Sediment Sampling Report, Crows Mill Creek

Hello Mark – Thank you, the June 18, 2018 responses address my April 2, 2018 comments. I'll post the responses and this email in NJEMS to close out the Ecological Component Review of the

Supplemental Sampling Report, February 19, 2018. Can you tell me if you are in communication with the EPEC LSRP on the AOC 4 matter? This area of the wetlands is severely contaminated and needs to be addressed.

Nancy

From: Mark Fisher [<mailto:mfisher@elminc.com>]

Sent: Tuesday, June 19, 2018 12:00 PM

To: Hamill, Nancy <Nancy.Hamill@dep.nj.gov>

Cc: Schick, Kevin <Kevin.Schick@dep.nj.gov>; Turner, Matthew <Matthew.Turner@dep.nj.gov>

Subject: RE: Hatco Site, Fords NJ, PI# G000003943: Supplemental Sediment Sampling Report, Crows Mill Creek

Thanks Nancy!

From: Hamill, Nancy <Nancy.Hamill@dep.nj.gov>

Sent: Tuesday, June 19, 2018 9:36 AM

To: Mark Fisher <mfisher@elminc.com>

Cc: Schick, Kevin <Kevin.Schick@dep.nj.gov>; Turner, Matthew <Matthew.Turner@dep.nj.gov>

Subject: RE: Hatco Site, Fords NJ, PI# G000003943: Supplemental Sediment Sampling Report, Crows Mill Creek

Thank you Mark – this email acknowledges receipt of your response. I'll review it shortly and get back to you.

From: Mark Fisher [<mailto:mfisher@elminc.com>]

Sent: Monday, June 18, 2018 10:58 PM

To: Hamill, Nancy <Nancy.Hamill@dep.nj.gov>

Cc: Schick, Kevin <Kevin.Schick@dep.nj.gov>; Turner, Matthew <Matthew.Turner@dep.nj.gov>;

Haklar, James <Haklar.James@epa.gov>; Schindler, Jason <Jason.Schindler@WestonSolutions.com>;

Devorak, Coleen <Coleen.Devorak@WestonSolutions.com>

Subject: RE: Hatco Site, Fords NJ, PI# G000003943: Supplemental Sediment Sampling Report, Crows Mill Creek

Hi Nancy – Provided below are responses to your questions and comments received on April 2, 2018, regarding the Results of Supplemental Sediment Sampling, Crows Mill Creek, report dated February 19, 2018. Please let me know if you have any questions or would like to discuss anything further via a conference call or quick meeting. Regards, Mark

NJDEP Comment 1. (p. 9) - Based on the information provided, I don't disagree with the overall conclusions regarding the potential for a separate BEHP contaminant source to the "CDG-382" area. The last bullet on p. 9 states that, based on data and concentration projections, the downstream extent from upstream sources are 1400-1800 feet downgradient of CDG 364 (where BEHP concentration = 58,000 mg/kg at 2.5-3' interval). However, the exact extent of contamination for which Weston is responsible is not clear. As per N.J.A.C. 7:26E-4.9, the RIR should clearly state the extent/dimensions of site-related contamination. Will Weston address BEHP and PCB contamination throughout the Northern and Central Portions of the AOC 25/Channel D area and into the Southern Portion to a distance of 1400-1800' downgradient of CDG 364, e.g., including CDG 364, 368, 373, and 374? I'm also still unclear about the conclusions for EPEC AOC4 in the May 2016 RIR. (RIR p. 2-72) - is Weston responsible for PCBs, BEHP, and NAPL in this area?

Response 1. As discussed in the RIR and based on the observed distribution of concentrations, BEHP and PCBs contamination from the Hatco site migrated into the northern portion of AOC 25 via Channel D. Further downstream, this contamination has commingled with contamination from other

sources. Weston is not responsible to remediate contamination from other (non-Hatco) sources. However, based on the existing data, we have not yet confirmed the limits of contamination specially related to Hatco within the commingled area. We expect to be able to discern those limits through our on-going evaluation of offsite source information obtained through recent regulatory file reviews. With the exception of the downstream limit described in the report dated February 19, 2018, the dimensions of the commingled contamination have not changed from those depicted in the RIR. With regard to EPEC AOC4, Weston has found no pathway or other nexus between the former Hatco site and this area of concern. Therefore, Weston cannot assume responsibility for the contamination associated with EPEC AOC4.

NJDEP Comment 2. Was the contamination identified at multiple CDG-382 locations called into the hotline? If yes, please provide incident report number.

Response 2. Yes, the contamination was called in to the NJDEP Spill Hotline on May 16, 2018 as a Verified Unknown Off-site source. The incident report number is 18-05-16-0919-24. Weston also advised the property owner, Woodbridge Township, of this condition/notification.

NJDEP Comment 3. (p. 7) - The footnote indicates that a "scope of work" for the site-specific risk assessment will be submitted the department. SOWs are not typically submitted - is the intended submission an Ecological Risk Assessment (ERA) Work Plan? If so, please note that under the LSRP program, work plans are not reviewed. The Ecological Evaluation Technical Guidance should be followed. If site-specific eco-risk based remediation goals are determined, they will forwarded to BEERA by BCAIN for approval.

Response 3. Weston is currently preparing an ERA Work Plan for review by the LSRP and property owners. Given NJDEP's continued involvement in this aspect of the project, Weston intended to provide a courtesy copy to NJDEP (but will not be seeking/expecting a formal review and approval of this workplan from NJDEP). Weston may seek a technical consultation meeting with the Department prior to implementing the ERA Work Plan to obtain any feedback that the Department is willing to provide.

NJDEP Comment 4. Figure 1, Southern Portion of Lowlands BEHP Results (large-scale drawing dated 1/12/2018) incorrectly compares BEHP data to 22 mg/kg (approved for open water sediment in Woodbridge Pond only) and 49 mg/kg (former human health-based residential soil cleanup criterion). Data exceeding 0.75 mg/kg (ESC/SEL) should be highlighted in red (specified as the delineation goal on p. 7 of this document). Please correct this figure and similar figures for the Northern and Central Portions for BEHP (assumed similar corrections needed) and resubmit all figures. It will facilitate the review if PCB and BEHP data are included together on the same figures, with sample dates and depths indicated. Please ensure that the CDG-382 delineation data are included on the revised figure for the Southern Portion.

Response 4. Figure 1 was intended simply to depict the sediment sample locations and results. The RAWP, when submitted to NJDEP, will include revised figures with comparisons to applicable remediation standards.

From: Hamill, Nancy <Nancy.Hamill@dep.nj.gov>

Sent: Friday, June 1, 2018 11:19 AM

To: Mark Fisher <mfisher@elminc.com>

Cc: Schick, Kevin <Kevin.Schick@dep.nj.gov>; Turner, Matthew <Matthew.Turner@dep.nj.gov>;

Haklar, James <Haklar.James@epa.gov>

Subject: FW: Hatco Site, Fords NJ, PI# G000003943: Supplemental Sediment Sampling Report, Crows Mill Creek

Hello Mark,

You acknowledged receipt of my April 2, 2018 comments, but I've not received your full response. I've resent the email, below. Please provide the full response by June 15, 2018.

Thank you.

Nancy

Nancy E. Hamill

Research Scientist

Bureau of Environmental Evaluation and Risk Assessment

Mailcode: 401-04M

P.O. Box 420

Trenton, NJ 08625

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Fax: 609-292-0848

From: Hamill, Nancy

Sent: Monday, April 2, 2018 2:52 PM

To: 'Mark Fisher' <mfisher@elminc.com>

Cc: Schick, Kevin <Kevin.Schick@dep.nj.gov>; 'Haklar, James' <Haklar.James@epa.gov>; Turner, Matthew <Matthew.Turner@dep.nj.gov>

Subject: Hatco Site, Fords NJ, PI# G000003943: Supplemental Sediment Sampling Report, Crows Mill Creek

Hello Mark,

Thank you for submitting *Results of Supplemental Sediment Sampling, Crows Mill Creek*, February 19, 2018. I've completed an Ecological Component Review of the document and have a few questions/comments:

1. (p. 9) - Based on the information provided, I don't disagree with the overall conclusions regarding the potential for a separate BEHP contaminant source to the "CDG-382" area. The last bullet on p. 9 states that, based on data and concentration projections, the downstream extent from upstream sources are 1400-1800 feet downgradient of CDG 364 (where BEHP concentration = 58,000 mg/kg at 2.5-3' interval). However, the exact extent of contamination for which Weston is responsible is not clear. As per N.J.A.C. 7:26E-4.9, the RIR should clearly state the extent/dimensions of site-related contamination. Will Weston address BEHP and PCB contamination throughout the Northern and Central Portions of the AOC 25/Channel D area and into the Southern Portion to a distance of 1400-1800' downgradient of CDG 364, e.g., including CDG 364, 368, 373, and 374? I'm also still unclear about the conclusions for EPEC AOC4 in the May 2016 RIR. (RIR p. 2-72) - is Weston responsible for PCBs, BEHP, and NAPL in this area?
2. Was the contamination identified at multiple CDG-382 locations called into the hotline? If yes, please provide incident report number.
3. (p. 7) - The footnote indicates that a "scope of work" for the site-specific risk assessment will be submitted the department. SOWs are not typically submitted - is the intended submission an Ecological Risk Assessment (ERA) Work Plan? If so, please note that under the

LSRP program, work plans are not reviewed. The *Ecological Evaluation Technical Guidance* should be followed. If site-specific eco-risk based remediation goals are determined, they will be forwarded to BEERA by BCAIN for approval.

4. Figure 1, *Southern Portion of Lowlands BEHP Results* (large-scale drawing dated 1/12/2018) incorrectly compares BEHP data to 22 mg/kg (approved for open water sediment in Woodbridge Pond only) and 49 mg/kg (former human health-based residential soil cleanup criterion). Data exceeding 0.75 mg/kg (ESC/SEL) should be highlighted in red (specified as the delineation goal on p. 7 of this document). Please correct this figure and similar figures for the Northern and Central Portions for BEHP (assumed similar corrections needed) and resubmit all figures. It will facilitate the review if PCB and BEHP data are included together on the same figures, with sample dates and depths indicated. Please ensure that the CDG-382 delineation data are included on the revised figure for the Southern Portion.

Please respond at your earliest convenience. I can arrange a conference call if you'd like to discuss further.

Thank you.

Nancy

Nancy E. Hamill

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